

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re PARMALAT SECURITIES  
LITIGATION,

This document relates to: 07 Civ. 03790

JOHN HANCOCK LIFE INSURANCE  
COMPANY, JOHN HANCOCK VARIABLE  
LIFE INSURANCE COMPANY, and JOHN  
HANCOCK INSURANCE COMPANY OF  
VERMONT,

Plaintiffs,

vs.

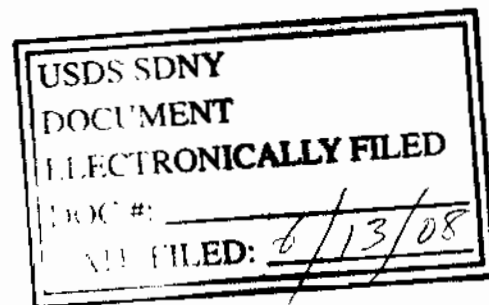
BANK OF AMERICA CORPORATION,  
BANK OF AMERICA, N.A., and BANC OF  
AMERICA SECURITIES LLC,

Defendants.

MASTER DOCKET

04 MD 1653 (LAK)

**JOINT STIPULATION AS TO  
RULE 56.1 STATEMENTS AND  
SUMMARY JUDGMENT OUTLINES**



This Joint Stipulation applies only to the above-captioned action, which was consolidated in the *In Re Parmalat* MDL proceeding on May 17, 2007.

1. The purpose of this Stipulation is to establish a schedule for the parties to serve upon each other, and submit to the Court, Rule 56.1 statements and summary judgment outlines.
2. In a November 13, 2007 Joint Stipulation, endorsed by the Court on November 15, 2007, the parties agreed to a schedule for expert discovery, which set the Completion of Expert Discovery for May 16, 2008. The parties further agreed that prior to the conclusion of the expert discovery period they would consult with one another and thereafter submit a proposed schedule to the Court with respect to the filing of dispositive motions.

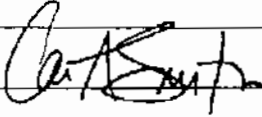
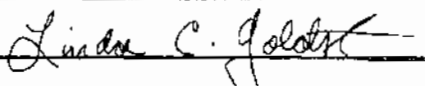
3. The parties have consulted and agreed to the following schedule for the exchange and submission of Rule 56.1 statements and summary judgment outlines, subject to the Court's approval:


- Exchange With Opposing Counsel Initial Rule 56.1 Statements and Summary Judgment Outlines: July 16, 2008
- Responses to Opposing Counsel Regarding Initial Rule 56.1 Statements and Summary Judgment Outlines: August 18, 2008
- Submissions to the Court of Finalized Rule 56.1 Statements and Summary Judgment Outlines: September 19, 2008

4. Notwithstanding the above, the parties agree that to the extent practicable, any summary judgment motions in the above-captioned action should be heard on the same briefing schedule as the other private placement cases consolidated for pretrial purposes before this Court. Accordingly, the parties will attempt in good faith to conform the schedule in Paragraph 3 above to any briefing schedule that may be set for dispositive motions in the following matters, *Principal Global Investors, LLC, et al. v. Bank of America Corporation, et al.*, 1:06-cv-01769-LAK; *Monumental Life Insurance Company, et al. v. Bank of America Corporation, et al.*, 1:06-cv-1768-LAK; *Allstate Life Insurance Company vs. Bank of America Corp., et al.*, 1:06-cv-04453-LAK; *The Prudential Insurance Company of America; and Hartford Life Insurance Company vs. Bank of America Corporation, et al.*, 1:06-cv-04449-LAK; and *Hartford Life Insurance Co. v. Bank of America Corp., et al.*, 1:06-cv-3805-LAK, should such briefing

schedule be prior to the dates referenced in Paragraph 3. The parties will inform the Court promptly of the results of any such discussions.

Dated: May 23, 2008

By 	By 
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Lewis A. Kaplan  
United States District Court Judge

6/12/08